

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS (Worcester)**

Anthony Campbell,)	
)	
Plaintiff,)	
vs.)	
)	Case No. 04-40236 FDS
)	
Isolation Technologies, Inc.)	
Larry D'Amato)	
Defendants)	

**PROPOSED STATEMENT AND PRE-TRIAL SCHEDULE
OF DEFENDANT, ISOLATION TECHNOLOGIES, Inc.**

1. STATEMENT OF CLAIMS AND DEFENSES

- A. Plaintiff: Plaintiff alleges that Defendant failed to offer employment due to his race.
- B. Defendant: Defendant denies the claims and asserts that an offer of employment with the Defendant was made, however, and rejected by the Plaintiff.

2. DISCOVERY PLAN

(i) Fact Discovery

- A. Initial Rule 26(a)(1) Disclosures: April 15, 2005
- B. Deadline to serve written discovery requests: May 6, 2005
- C. Completion of depositions: July 8, 2005

(ii) Expert Discovery

- A. Plaintiff's Designation of Experts: August 5, 2005
- B. Defendant's Designation of Rebuttal Experts: September 2, 2005
- C. Completion of Expert Depositions: September 30, 2005

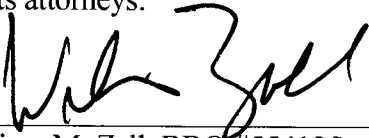
3. SCHEDULE FOR FILING OF MOTIONS

- A. Dispositive Motions to be filed by: October 28, 2005
- B. Responses to Dispositive Motions to be filed by: November 11, 2005
- C. Reply memos filed by: November 25, 2005

Respectfully submitted this 24th day of March, 2005.

Isolation Technologies, Inc.

By its attorneys:

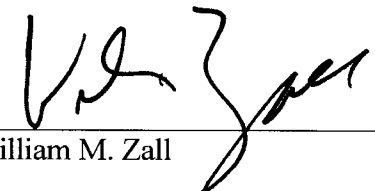


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Dated: March 24, 2005

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon each party appearing pro se by mail on March 24, 2005.



William M. Zall